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[	Robert T. Mills (Arizona Bar #018853)
	Sean A. Woods (Arizona Bar #028930)
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5	Attorneys for Plaintiffs

# UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

Debra Morales Ruiz, an individual, for No.: CV-23-02482-PHX-SRB (DMF) herself and on behalf of and as pending Personal Representative of The Estate of Alexander Chavez; Alex George Chavez, an individual,

### Plaintiffs,

VS.

County of Maricopa, a governmental entity; Brandon Smith and Jane Doe Smith; Paul Penzone and Jane Doe Penzone; David Crutchfield, an individual; Lisa Struble, an individual; Kyle Moody and Jane Doe Moody; Arturo Dimas and Jane Doe Dimas; Tyler Park and Jane Doe Park; Gerardo Magat and Jane Doe Magat; Daniel Hawkins Jr. and Jane Doe Hawkins; Javier Montano and Jane Doe Montano; James Dailey and Jane Doe Dailey; Trevor Martin and Jane Doe Martin; Greggory Hertig and Jane Doe Hertig; John Chester and Jane Doe Chester; Jorge Espinosa Jr. and Jane Doe Espinosa; Morgan Rainey and John Doe Rainey; Stefanie Marsland and John Doe Marsland; and, John and Jane Does 1-40,

Defendants.

# STIPULATION FOR EXTENSION OF TIME TO FILE RESPONSE TO MOTION TO DISMISS SECOND AMENDED COMPLAINT

## (First Request)

(Assigned to the Honorable Susan R. Bolton and referred to the Honorable Deborah M. Fine)

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Through counsel undersigned and pursuant to Rule 7.3 of the Local Rules of Civil Procedure, Plaintiffs and Defendants hereby stipulate and agree to an extension of time for Plaintiffs to file their Response to Defendants' "Motion to Dismiss Second Amended Complaint," ECF No. 39 (the "Motion"), until no later than November 15, 2024. Such an extension is necessary and appropriate because Plaintiffs' counsel is in the midst of preparing for an upcoming jury trial in another matter. This Stipulation is agreed to in good faith and not for purposes of delay. A [Proposed] Order is attached hereto.

# **RESPECTFULLY SUBMITTED** this 4th day of November 2024.

#### MILLS + WOODS LAW, PLLC

By\_ /s/ Sean A. Woods Robert T. Mills Sean A. Woods 5055 N 12th Street, Suite 101 Phoenix, AZ 85014 Attorneys for Plaintiffs

#### MARICOPA COUNTY ATTORNEY

/s/ Courtney R. Glynn (w/ permission) By\_\_\_ Courtney R. Glynn Michael E. Gottfried 225 W Madison St. Phoenix, AZ 85003 Attorneys for Maricopa County, Dimas, Hawkins, Hertig, Martin, Montano, Moody, Park, Smith, Chester, Rainey, Marsland, Struble, Crutchfield, Magat, Dailey, and the Maricopa County Sheriff

# MILLS + WOODS LAW, PLLC 055 North 12th Street, Suite 101 Phoenix, AZ 85014 480.999.4556

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1	CERTIFICATE OF SERVICE
2	I hereby certify that on November 4, 2024, I electronically transmitted the foregoing
3	document to the Clerk's Office using the ECF System for filing and transmittal of a Notice
4	of Electronic Filing to the following ECF registrants:
5	Courtney R. Glynn
6	glynnc@mcao.maricopa.gov Michael E. Gottfried
7	gottfrim@mcao.maricopa.gov
8	RACHEL H. MITCHELL MADICODA COUNTY ATTORNEY
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11	rita.kleinman@mcao.maricopa.gov
12	225 W Madison St. Phoenix, AZ 85003
13	Attorneys for Maricopa County, Dimas, Hawkins, Hertig, Martin, Montano, Moody, Park,
14	Smith, Chester, Rainey, Marsland, Struble, Crutchfield, Magat, Dailey, and the Maricopa County Sheriff
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16	/s/ Ben Dangerfield
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